

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before the Honorable _____
Administrative Law Judge**

In the Matter of

**CERTAIN MOBILE DEVICES WITH
HARDWARE AND SOFTWARE FOR
EXCHANGING ELECTRONIC
CONTENT**

Investigation No. 337-TA-3927

**AMENDED VERIFIED COMPLAINT OF
COMPLAINANT GG TECHNOLOGIES, INC. D/B/A STAYTOUCH UNDER
SECTION 337 OF THE TARIFF ACT OF 1930, AS AMENDED**

COMPLAINANT

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PROPOSED RESPONDENT

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2	PCT Application No. PCT/US2020/032216
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4	European Patent Publication No. 3 966,773 A0
5	Infringement Claim Chart for U.S. Patent No. 12,022,369
6	Domestic Industry – Technical Prong Claim Chart for U.S. Patent No. 12,022,369
7	Complaint filed in Case No. 6:26-cv-00237 in the United States District Court for the Western District of Texas
8	Excerpts from https://www.staytouch.com
9	Article titled “What is the Secret of Building a Disruptive App? Here’s What You Need to Know,” Published July 8, 2019, available at https://creativitymarketing.org/blog/2019/07/08/stay-touch/
10	Article titled “StayTouch launches to revolutionise the way we make connections,” Published September 11, 2019, available at https://techround.co.uk/news/staytouch-launches-to-revolutionise-the-way-we-make-connections/
11	Article titled “Apple announces powerful new privacy and security features,” Published on June 5, 2023 in the Apple Newsroom, available at https://www.apple.com/newsroom/2023/06/apple-announces-powerful-new-privacy-and-security-features/
12	Apple Support Page titled “Use NameDrop on iPhone to share your contact info,” available at https://support.apple.com/guide/iphone/namedrop-iphone-share-contact-info-iph1b6c664b7/ios
13	Apple iPhone Web Page, available at https://www.apple.com/iphone
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17	[CONFIDENTIAL] Declaration of Gaurav Goel in Support of Domestic Industry—Economic Prong
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E	File History for U.S. Patent No. 11,245,737
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G	File History for U.S. Patent Application No. 18/667,214
H	Cited Prior Art References on the Face of U.S. Patent No. 12,022,369

I. INTRODUCTION

1. GG Technologies, Inc. d/b/a StayTouch (“StayTouch” or “Complainant”) hereby requests that the United States International Trade Commission (the “Commission” or the “ITC”) institute an investigation into violations of Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337 (“Section 337”), against Respondent Apple Inc. (“Apple” or “Respondent”) for importation of certain Apple iPhone and Apple Watch products that contain the “NameDrop” functionality as part of their operating systems, as those products infringe StayTouch’s U.S. Patent No. 12,022,369 (“369 Patent”).

2. In particular, StayTouch brings the instant action to address clear patent infringement by Apple in each and every new iPhone and Apple Watch imported into the United States. For the reasons given herein, the Commission should institute this Investigation, and ultimately should grant StayTouch a Limited Exclusion Order and Cease and Desist Order as to the infringing Apple iPhone and Apple Watch products.

3. In 2018, StayTouch and its founder, Mr. Gaurav Goel, an India Institute of Technology-trained engineer with an advanced degree in business, recognized a problem persistent in the business world: cumbersome exchange of contact information can stifle, if not prohibit, networking amongst business professionals. Mr. Goel set out to solve this problem, and landed on a touchless solution by which two devices, brought into close proximity to each other, would sense their proximity and enable the seamless transfer of contact information from one device to another.

4. Investing substantially in his idea, Mr. Goel spent hundreds of thousands of dollars (against revenues that to date have not exceeded those expenditures) in the United States and elsewhere to bring the invention to life. He filed patent applications, and developed iPhone and

Android applications that would permit users to utilize his inventions. That mobile device application is called StayTouch, and is available in the Apple and Android application stores from its August, 2019 launch to the present.

5. Unfortunately for StayTouch, Apple realized (long after Mr. Goel did) the value of this technology. Starting with iOS 17.1 and the Apple Watch OS in the fall of 2023, Apple rolled out its NameDrop feature to every new iOS user (or every user who upgraded their phone software and had the requisite NFC and/or BLE hardware therein). Today, NameDrop is a feature on millions of iPhones and Apple Watches worldwide.

6. Apple's launch of NameDrop all but gutted StayTouch's desirability in the market.

7. Why buy the cow if you can get the milk for free?

8. As such, StayTouch and Mr. Goel have no choice but to assert Complainant's intellectual property—and in particular, its U.S. Patent No. 12,022,369—in this Investigation and elsewhere around the world.

9. StayTouch previously filed a District Court action in the Western District of Texas to preserve its right to seek damages for past infringement, and is presently asserting the Indian counterpart to the '369 Patent in a case in India where it will seek injunctive relief and damages.

10. This Complaint is based on Respondent's unlawful and unauthorized importation into the United States, sale for importation into the United States, and/or sale within the United States after importation of certain mobile devices in the form of iPhone and Apple Watch devices of a certain vintage (hereinafter the "Accused Products"), including each and every product imported after the filing of this Complaint, that infringe the '369 Patent. Pursuant to 19 C.F.R. § 210.12(a)(12), Complainant states that the Accused Products are mobile wireless devices (smartwatches and smartphones) that can automatically initiate a contact information exchange

when they are brought in the proximity of another, similarly-equipped, device. The mobile devices at issue in this Investigation are mobile phones (e.g., iPhones) or smart watches (e.g., Apple Watches); the accused do not include iPad tablets or laptop computers at this time.

11. Respondent has engaged in unlawful acts in violation of Section 337(a)(1)(B) through their unlicensed importation, sale for importation, and/or sale after importation of Accused Products that infringe the ‘369 Patent; StayTouch asserts that such Accused Products infringe at least Claims 1-3 and 13-17 of the ‘369 Patent (the “Infringed Claims”).

12. StayTouch owns full rights, title, and interest in and to the ‘369 Patent. Ex. 1.

13. StayTouch has an existing domestic industry under Section 337(a)(2)–(3) through its investments in significant investment in plant and equipment, significant employment of labor or capital; or substantial investment in its exploitation, including engineering, research and development, or licensing. In support of this claim, StayTouch provides factual evidence in the form of a Confidential Declaration of the CEO and Founder of StayTouch, Mr. Gaurav Goel, attached hereto as Exhibit 17.

14. StayTouch seeks relief from the Commission in the form of a permanent limited exclusion order under 19 U.S.C. § 1337(d), excluding from entry into the United States Accused Products that infringe the ‘369 Patent. StayTouch further seeks cease and desist orders under 19 U.S.C. § 1337(f) halting Respondent from conducting any of the following activities in the United States: importing, selling, marketing, advertising, distributing, transferring, or soliciting U.S. agents or distributors for, mobile devices that incorporate or display or are marketed or sold in connection with the ‘369 Patent. StayTouch further seeks as relief a bond of 100% of the retail sales value upon importation of Respondent’s Accused Products that infringe one or more claims of the ‘369 Patent during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j).

II. THE PARTIES

15. Complainant is a Delaware Corporation with a principal place of business at 401 Wilshire Boulevard Suite 1200, Santa Monica, California, 90401.

16. Complainant is the owner by assignment of the '369 Patent. Ex. 1.

17. Complainant was the first company (and its founder the first person) to recognize the deficiencies in 2018 of various mechanisms for seamlessly exchanging contact information in busy corporate or social settings. Complainant's technology, including the technology described and claimed in the '369 Patent, permits individuals to exchange contact information simply by bringing their devices within close proximity of one another. With Complainant's technology, users no longer need to awkwardly stop their conversation, fish around for paper and pen to write (or open up their contacts application to tap in) the other party's contact information. The technology that underlies Complainant's StayTouch application permits the user to pre-select which information to exchange, such that when the seamless exchange occurs, the desired contact information (and only the desired contact information) is exchanged between the devices and with security as errorless information is exchanged with mutual acceptance and only in close proximity.

18. Respondent is a California corporation with a principal place of business at 1 Infinite Loop, Cupertino, CA 95014. Respondent produces abroad, sells for importation, imports, and/or sells in the United States after importation Accused Products. For example, Respondent's iPhone products are sold for importation. Ex. 13, 15, 18. In addition, Respondent's Apple Watch products are sold for importation. Ex. 14, 16, 19.

III. BACKGROUND INFORMATION ON THE PRODUCTS AT ISSUE

A. StayTouch's Groundbreaking Contact-Sharing Application

19. StayTouch was formed in 2018 based on the vision of its founder, Gaurav Goel. Mr. Goel has an engineering background, having received a degree from the India Institute of

Technology in Bachelors of Technology in Electrical Engineering with a focus on power systems, so he is well experienced to solve the kinds of problems addressed in the '369 Patent.

20. In addition, Mr. Goel attended sought-after management studies at the coveted EESCP business school in France.

21. He used the two degrees to secure employment in investment banking at Goldman Sachs, among other private equity jobs, in the years following graduation.

22. It was during Mr. Goel's career in finance that he discovered the problem he would ultimately solve with the '369 Patent. In particular, Mr. Goel, a frequent attendee of networking events and conferences, Mr. Goel realized the inefficiency of various mechanisms for exchanging contact information with individuals he had encountered in his professional and personal life.

23. Handing business cards with a handshake still required additional steps for both parties to input that information in their electronic devices, and there was no guarantee that either (or both) recently acquainted parties would take that step.

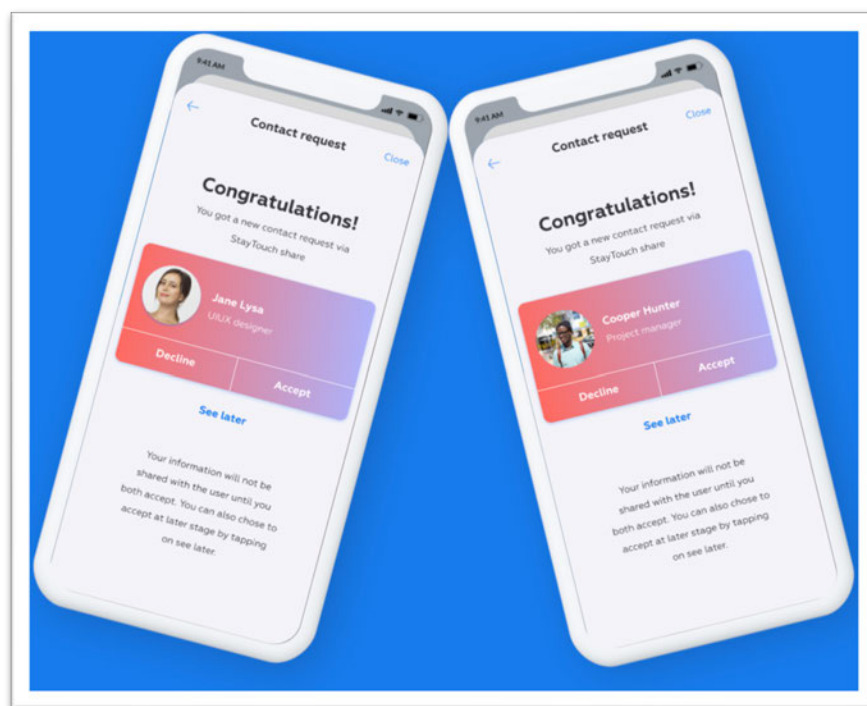
24. Even some then-existing automation techniques, such as the scanning of QR codes embedding (or linking to) contact information, are not bi-directional, meaning that there is no guarantee both parties share their information with each other. Moreover, there was lack of security due to involuntary exchange of information. Those techniques also require relatively involved user interaction, such as manipulating camera applications, manually pairing or searching devices for information to share, and clicking input mechanisms on their devices to ensure storage of the contact information when linked.

25. Even with some wireless transmission schemes then-known, Mr. Goel recognized that substantial deficiencies remained. For example, Bluetooth Low Energy (LE) connections are

prone to breaking during transfer, and particularly in a crowded room, it is difficult to ensure that two particular devices connect for the exchange of information.

26. Finally, Mr. Goel recognized the difficulty of many then-existing information exchange techniques that relied on a central server or other substantial infrastructure to facilitate the exchange of information between users. This requirement limits the applicability of prior contact transfer mechanisms to settings where reliable, secure, wireless communication networks are available, and thus eliminates the ability to transfer contact information in, for example, an airplane or in other places where WiFi and cellular service is not available.

27. Mr. Goel solved these and many other problems with the development and implementation of the StayTouch application:

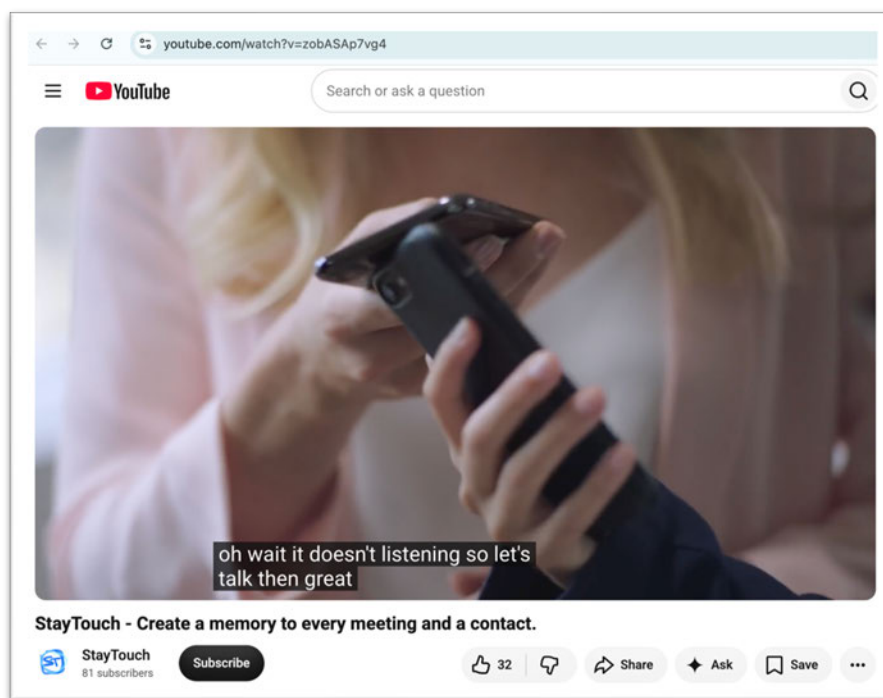


Ex. 8 (StayTouch Website – Key Features Page).

28. StayTouch launched in July, 2019 (Ex. 9 (<https://creativitymarketing.org/blog/2019/07/08/stay-touch/>)) and by September, 2019, the fanfare

had built around this “fuss-free way of sharing contact information and remembering who we met where and when...”. Ex. 10 (<https://techround.co.uk/news/staytouch-launches-to-revolutionise-the-way-we-make-connections/>). The application embodied Mr. Goel’s vision for a seamless, touch-to-tap experience where users can essentially “shake hands” with their mobile devices and in so doing, ensure that both parties receive the other’s contact information for future use. With StayTouch, users no longer had to awkwardly tap information into their phone, or otherwise go through the prior art processes to enter information about new connections into their devices while avoiding mistakes and misspellings all the while keeping data security at its core.

29. StayTouch also experienced a viral YouTube moment, with a video touting its capabilities garnered more than 60,000 views since its posting:



<https://youtu.be/zobASAp7vg4?si=pOefgS7h4EI0x6if>. This is unsurprising, given that StayTouch solved a major problem that, prior to its invention and introduction, had never before been solved.

30. StayTouch continues to grow and enjoy market success, though it fights substantial headwinds from Respondent. Immediately prior to the COVID-19 pandemic, StayTouch launched its services at the prestigious Harvard University, and begun and continues to grow its brand ambassador program. More recently, StayTouch’s offerings have gained traction in the business-to-business (“B2B”) space, with businesses preferring StayTouch’s feature set to larger messaging platforms like Microsoft’s Teams and the Slack platform. In addition, while the COVID-19 pandemic drastically affected how people interacted with each other, it heightened the understanding that there was value in touchless exchange of information, and in particular personal contact information, to avoid some of the person-to-person contact that may contribute to health issues in the world.

31. StayTouch was and remains available on the Apple App Store (<https://apps.apple.com/us/app/staytouch-smart-connections/id1419949235?ls=1>) and on the Android AppStore (<https://play.google.com/store/apps/details?id=com.staytouch&pli=1>). Between the two stores, StayTouch has been downloaded tens of thousands of times, and the application itself has undergone hundreds of different version-specific revisions.

B. Apple’s After-The-Fact Entry with Copycat Feature NameDrop

32. Unfortunately for Complainant, a global pandemic hit the world shortly after the launch of StayTouch. Usage dwindled through 2020 and into 2021, and as the world began to get back together in person, technology giant Apple Inc. decided it wanted the StayTouch technology to be a part of its iOS and Watch ecosystem. On June 5, 2023, Apple made a press release touting the StayTouch technology, newly added to the Apple ecosystem as “NameDrop”:

- With **NameDrop**, a new **AirDrop** experience, a user can hold their iPhone near another to share their contact information with only their intended recipients. Users can also choose the specific contact details they want to share — and, importantly, what information they don't want to share. Users can also share content like photos or links the same way. Apple Watch users can also use NameDrop by tapping the Share button in My Card in the Contacts app, or by tapping the My Card watch face complication, and then bringing Apple Watch face to face with someone else's Apple Watch. As with all AirDrop experiences, these new features securely share content over an encrypted connection.

Ex. 11 (<https://www.apple.com/newsroom/2023/06/apple-announces-powerful-new-privacy-and-security-features/>). Apple's explanation of how the feature works demonstrates just how similar NameDrop is to StayTouch, albeit as a baked-in feature of the Apple operating systems:

Use NameDrop on iPhone

1. Hold the display of your iPhone a few centimeters from the top of the other person's iPhone or Apple Watch.
2. Continue holding your devices near each other until NameDrop appears on both screens.
3. Choose to share your contact card and receive the other person's, or to only receive the other person's.

If you're sharing your contact card, tap ➤, select the fields you want to include, then tap Save. The same fields will be selected by default next the time you use NameDrop.

To cancel, move the two devices away from each other or lock your iPhone before the NameDrop transfer completes.

Ex. 12 (<https://support.apple.com/guide/iphone/namedrop-iphone-share-contact-info-iph1b6c664b7/ios>).

33. Respected technology publication TechCrunch touted the release of Apple's NameDrop feature, describing nearly verbatim the benefits that StayTouch had explained to the world years earlier:

Apple's iOS 17 update is delivering a number of quality-of-life improvements to the iPhone's software, including those that will allow users to better interact with their favorite apps and customize the device to their liking. Among these is an update to AirDrop, which now includes a new gesture where you can bring your phones together to share information — essentially bumping the phones to send someone your contact details. Perhaps for meeting new people, business conferences and quicker than sending the contact info via text, when in person.

The feature, cleverly dubbed NameDrop, has you bringing your phone close together with someone else in order to exchange contact information. When you do, you'll see the same newly introduced contact poster that appears during phone calls appear on the screen. And you can easily choose the phone numbers and email addresses you want to share alongside the contact exchange as a part of this process. This feature works across iPhone and Apple Watch, the company says.

Ex. 20 (<https://techcrunch.com/2023/06/05/airdrop-in-ios-17-will-let-you-share-contact-info-by-bringing-two-iphones-close-together/>)

34. Apple's launch of NameDrop looked very much like the StayTouch launch, but at Apple scale. The feature itself is technologically nearly identical to StayTouch, and since its launch Apple has included NameDrop (and the requisite hardware to make NameDrop work) as a default feature in each iOS and Apple Watch device imported into the United States.

IV. THE ASSERTED INTELLECTUAL PROPERTY

A. Identification and Ownership of the '369 Patent

35. Complainant is the owner, by assignment, of U.S. Patent No. 12,022,369 (Appendix A ('369 Patent); Ex. 1 (Assignment)). The '369 Patent issued on June 25, 2024, and claims priority to U.S. Provisional Application No. 62/845,753, filed on May 9, 2019 (several months before the launch of the StayTouch application). The '369 Patent expires on November 19, 2040.

B. Foreign Counterparts to the ‘369 Patent

36. Pursuant to Commission Rule 210.12(a)(9)(v), Complainant lists WO 2020/227680, filed as PCT Application No. PCT/US20/32216, as a foreign patent and/or foreign patent application (not already issued as a patent) corresponding to the ‘369 Patent. The Publication for the PCT Application is attached as Ex. 2. The PCT application has now lapsed; a copy of its prosecution file history is included as Appendix D.

37. Indian Patent No. 546169 is a foreign issued patent corresponding to the ‘369 Patent. Ex. 3.

38. EP Patent Application No. EP3966773A1 is a pending foreign patent application (not already issued as a patent) corresponding to the ‘369 Patent. Ex. 4.

39. In the United States, U.S. Patent Nos. 11,245,737 and 11,736,541 are in the same family as the ‘369 Patent. In addition, pending Application Serial No. 18/667,214 is a family member of the ‘369 Patent. File histories for each of these applications are included as Appendices E, F, and G. U.S. Provisional Application No. 62/845,753 is a parent application of the ‘369 Patent, and a copy of its file history is included as Appendix C.

C. Licensees to the ‘369 Patent

40. There are presently no licensees to the ‘369 Patent.

D. Prosecution Histories of the ‘369 Patent and its Priority Documents

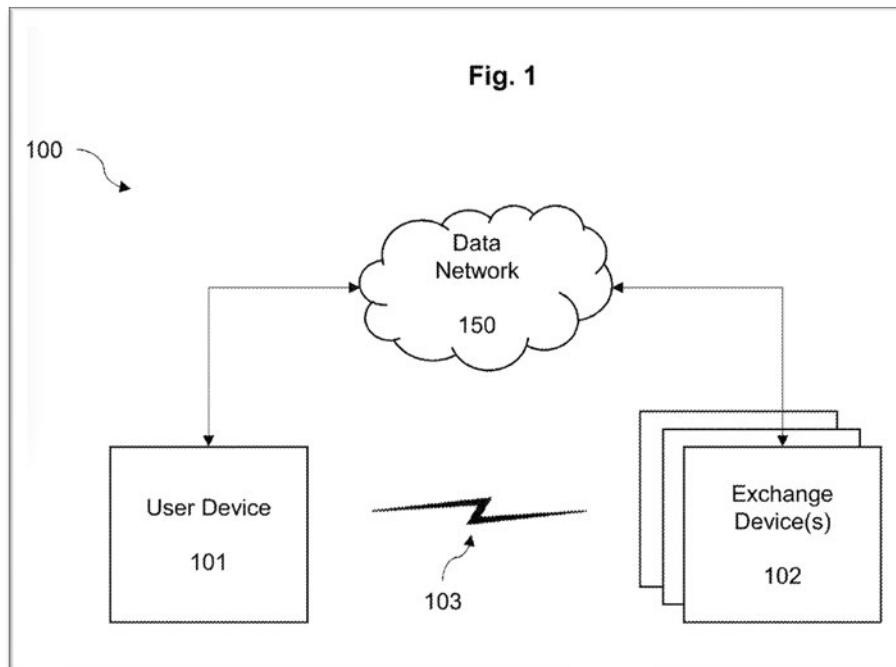
41. Appendix B hereto contains a copy of the file history of the ‘369 Patent. Appendices C to G contain USPTO file histories for applications in the family as the ‘369 Patent, and Appendix H hereto contains a copy of all of the cited prior art of record in the ‘369 Patent’s USPTO file history.

E. Non-Technical Description of the ‘369 Patent¹

42. The ‘369 Patent explains that it is directed to a “content sharing system [that] enables a smooth an easy exchange of electronic data.” Appx. A at Abstract. It begins by noting the deficiencies of a number of then-existing electronic “fingerprint” exchange technologies including Respondent’s AirDrop technology. *Id.* at 1:28-40. The ‘369 Patent notes difficulties in scanning for nearby devices, pairing with a particular device, and bidirectionally exchanging information between those devices. *Id.* at 1:41-47. It also notes that existing electronic exchange mechanisms were not secure, owing in large part to the need to scan a relatively large area for potential pairing partners. *Id.* at 1:58-2:1. It thus sets forth “an improved system for data exchange in an effort to overcome” these and other deficiencies. *Id.* at 2:41-44.

43. In relevant part, the ‘369 Patent describes a system whereby a pair of devices can communicate “directly (via a proximity-based communications channel)” as shown in Figure 1:

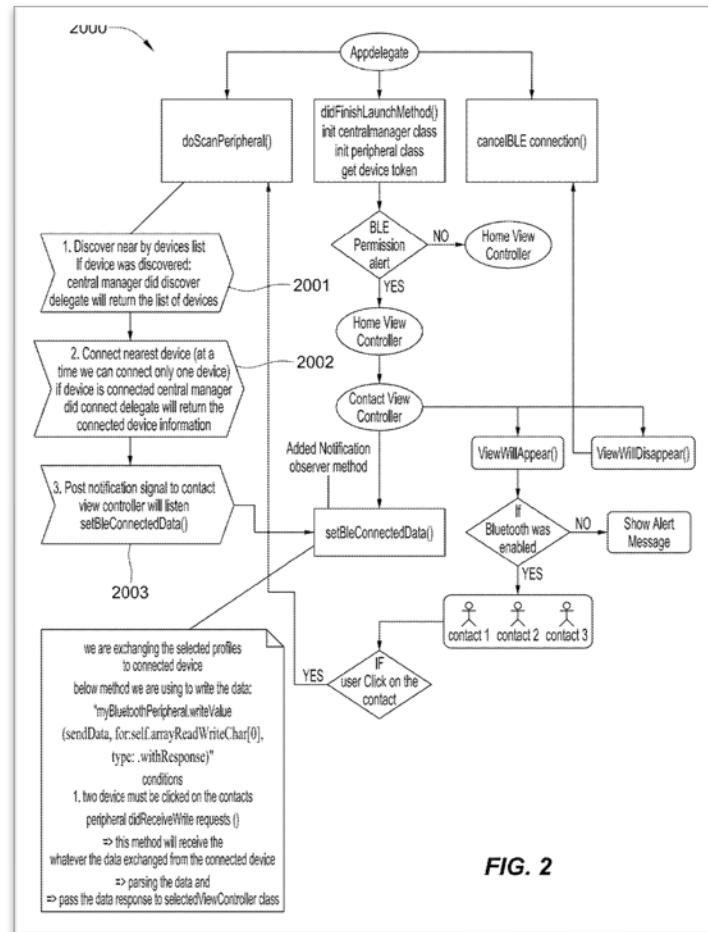
¹ The non-technical description of the ‘369 Patent herein is presented to give a general background of the invention. Such statements are not intended to be used, nor should be used, for purposes of patent claim interpretation. Complainant presents these statements subject to, and without waiver of, its right to argue that claim terms should be construed in a particular way as contemplated by claim interpretation jurisprudence and the relevant evidence.



Appx. A at Fig. 1; 5:31-35. It explains that the information exchanged between devices 101 and 102 can include “electronic contact information.” *Id.* at 5:39-40.

44. In embodiments where the devices communicate “directly” with each other, they do so via “proximity-based communications channel 103” which can advantageously be a near field communications (NFC) channel. *Id.* at 6:32-39. The ‘369 Patent specifically describes AirDrop from Apple® as one such suitable NFC channel. *Id.* at 6:40-43. The ‘369 Patent explains that there need not be a manual interaction to setup a connection between two devices. *Id.* at 6:48-58. This makes the transaction between devices seamless. *Id.* at 7:4-7.

45. Figure 2 of the ‘369 Patent demonstrates one example flow 2000 in which devices pair and exchange information, such as confirmation, without user interaction:



Id. at Fig. 2. The ‘369 Patent illustrates an example of this flow in connection with Figures 8A-8C:



Id. at Figs. 8A-8D; 11:4-35. Importantly, the embodiment described in connection with Fig. 8 is one in which the user must accept a contact before it is sent. *Id.* at Fig. 8D; 11:33-35.

F. Claims of the ‘369 Patent

46. Claim 13 of the ‘369 Patent is representative for purposes of the instant Complaint:

13. A computing device for facilitating the contactless exchange of digital information with one or more exchange devices, the computing device comprising:
a display screen;
a central processing unit for executing a mobile application, the mobile application providing a graphical user interface on the display screen; and
an antenna configured for proximity-based communication with the one or more exchange devices,

wherein the central processing unit automatically scans to identify the one or more exchange devices within a predetermined range via the antenna,
filters the scanned devices,
selects at least one of the one or more exchange devices for presentation on the graphical user interface, and
directly exchanges at least a profile identification (ID) and a user ID with the selected exchange devices,
thereby prompting the selected exchange device to display a second user interface for accepting two-way communication for directly exchanging digital contact information with the user device.

V. RESPONDENT’S UNLAWFUL AND UNFAIR ACTS: DIRECT, LITERAL INFRINGEMENT OF THE ‘369 PATENT BY IPHONE AND APPLE WATCH PRODUCTS

47. Respondent has engaged in unlawful and unfair acts including the sale for importation into the United States, importation into the United States, sale within the United States after importation, and/or use of the Accused Products, the use of which in the United States infringes at least Claims 1-3 and 13-17 of the ‘369 Patent (i.e., the Infringed Claims).

48. These infringing activities by Respondent constitute a violation of Section 337. The infringement allegations contained in this Complaint include Respondent’s direct infringement of the ‘369 Patent by the use of the Accused Products.

49. The unlawful acts described below are provided by way of example only. Further discovery may reveal other products, the use of which infringes the claims of the ‘369 Patent, that are also sold for importation into the United States, imported into the United States, and/or sold

after importation within the United States. Further discovery may also reveal that additional claims of the ‘369 Patent are infringed by the use of Respondent’s products.

50. Respondent Apple Inc. has been given notice of its infringement by, among other things, the issue date of the ‘369 Patent, which published on June 25, 2024. In addition, Apple was made aware of its infringement by this Complaint and the detailed infringement charts attached hereto. Ex. 5. Prior to the filing of this Complaint, Apple was aware of the ‘369 Patent (and its infringement of the same) at least because of a filing made in the Western District of Texas detailing Apple’s infringement of the ‘369 Patent. Ex. 7.

VI. SPECIFIC INSTANCES OF IMPORTATION AND SALE

51. Upon information and belief, Respondent imports, sells for importation, and/or sells within the United States after the Accused Products.

52. Upon information and belief, the Accused Products are currently being sold online and with retailers across the United States, such as Target. See Exhibits 13, 14, 15, 16. At present, StayTouch is unable to quantify the volume of imports, of sales for importation, and of sales after importation of the Accused Products in the United States. However, as every iPhone with an operating system of iOS17.1 and beyond, and every Apple Watch sold with Watch OS 10.1 or later, infringes the ‘369 Patent, the volume of infringing imports is substantial.

53. On information and belief, StayTouch believes that Apple is importing more than 95% of iPhone and Apple Watch products with versions of their native operating system software that enables the NameDrop functionality.

54. StayTouch has investigated the packaging of the Accused Products, and the indicates that the products are manufactured abroad and are imported from at least India and Vietnam. Ex. 18, 19. A declaration of StayTouch’s undersigned counsel is attached hereto detailing the dates and circumstances of such importation. Ex. 21.

VII. COMPLAINANT'S DOMESTIC INDUSTRY

A. Technical Prong

55. StayTouch sells within the United States the StayTouch application that is usable by StayTouch customers on their smartphone mobile devices. Each and every iteration of the StayTouch application that has ever been released to the public practices the Infringed Claims of the '369 Patent, regardless of device or operating system. If a device is compatible and if the StayTouch application is downloaded, that device practices the Infringed Claims.

56. An exemplary claim chart demonstrating how StayTouch's domestic products are covered by at least claim 13 of the '369 Patent is attached as Exhibit 6. Because these products practice at least one claim of the '369 Patent, they satisfy the requirements of 19 U.S.C. § 1337(a)(B)(ii).

B. Economic Prong

57. StayTouch has made, and continues to make, substantial investments in the United States to create and support the StayTouch application, which embodies the '369 Patent, and therefore is the Domestic Industry Product.

58. A domestic industry, under subparts (A), (B), and/or (C) or Section 337(a)(3) exists by virtue of StayTouch's significant domestic investment in equipment and labor and/or substantial investment in U.S. exploitation of the '369 Patent, including through research, development, and marketing and advertising of the Domestic Industry Product (the StayTouch application).

59. StayTouch has made, and continues to make, a significant investment in its employees, contractors, and support staff involved in the Domestic Industry Product in the United States. StayTouch employees are involved in research and development, product support, sales,

technical services, marketing, and customer support, among other things, for the Domestic Industry Product in the United States.

60. The Confidential Declaration of StayTouch CEO, Gaurav Goel (Exhibit 17 hereto) further describes the activities that confirm that StayTouch has established a domestic industry in the United States with respect to the StayTouch application.

VIII. STAYTOUCH HAS ESTABLISHED A DOMESTIC INDUSTRY

61. Respondent's unlawful importation and sale of the Accused Products has already caused substantial injury to StayTouch, and has the future threat or effect of causing continued injury, at least by reason of impairment of StayTouch's ability to sell its mobile application at all and because of the infringement of the '369 Patent. What was once a saleable, chargeable, mobile phone application (containing a feature Apple believed users desired enough to add it to its stock operating system) is now included, for free, with every Apple iPhone and Apple Watch imported into the United States. This not only harms StayTouch's goodwill and business reputation, but makes it nearly impossible for StayTouch to sell its mobile phone application due to the ability to get it for free on some of the United States' most popular mobile devices.

62. The fact that NameDrop is included by default (and without an additional fee) in the Apple ecosystem is particularly problematic for StayTouch, which offers the original version of the technology but must do so for a fee. Apple's use of StayTouch's technology, without a license, is thus especially unfair and should be halted.

63. StayTouch has invested heavily in its application, which embodies the '369 Patent, in the United States and abroad. StayTouch has spent more than half a million dollars in the United States, and more than three million dollars worldwide, to promote its business, generate user feedback to work into its StayTouch application, and to otherwise ensure that the patented technology gets into the hands of United States mobile device users. Given Apple's infringement

of the ‘369 Patent, StayTouch’s efforts have been for naught; while StayTouch introduced users to the patented functionality, Apple currently gives it to them for free.

64. As such, not only does Respondent’s infringement of the ‘369 Patent harm StayTouch’s domestic industry, but it indeed eliminates StayTouch’s domestic industry.

IX. HARMONIZED TARIFF SCHEDULE INFORMATION

65. On information and belief, the articles subject to this Complaint are classifiable under at least the following headings and subheadings of the Harmonized Tariff Schedule (“HTS”) of the United States: 8471.30.01 (Portable automatic data processing machines, weighing not more than 10 kg, consisting of at least a central processing unit, a keyboard and a display); 8471.49.00 (Other automatic data processing machines entered in the form of systems); 8471.50.01 (Processing units other than those of subheading 8471.41 or 8471.49, whether or not containing in the same housing one or two of the following types of unit: storage units, input units, output units); 8517.13.00 (Smartphones); 8517.62.90 (Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus: Other); 8541.21.00 (Transistors, other than photosensitive transistors); 8541.50.00 (Other semiconductor devices); 8542 (Electronic integrated circuits); and 8542.31.00 (Processors and controllers, whether or not combined with memories, converters, logic circuits, amplifiers, clock and timing circuits, or other circuits).

66. These HTS identifications are for illustrative purposes only, in compliance with the Commission Rules, and are not intended to restrict the scope of the Investigation.

X. RELATED LITIGATION

67. Pursuant to Commission Rule 210.12(a)(5), Complainant is asserting the ‘369 Patent against Respondent in the following district court proceedings:

- Case No. 6:26-cv-00237-JKP-DNM; *GG Technologies, Inc. d/b/a StayTouch v. Apple Inc.*, United States District Court for the Western District of Texas on April 10, 2026. Ex. 7.
- Case No. Mediation No. 121/2026, filed in the Main Mediation Centre High Court of Judicature at Bombay, India, on April 10, 2026.

To Complainant's knowledge, the alleged unfair methods of competition and unfair acts, or the subject matter thereof, are not, and have not been, the subject of any other court or agency litigation than what is listed above.

XI. RELIEF REQUESTED

WHEREFORE, by reason of the foregoing, Complainant GG Technologies, Inc. respectfully requests that the United States International Trade Commission:

- a.) Institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to Respondent's violations of that section based on the importation into the United States, sale for importation, sale within the United States after importation, and/or use of Respondent's Accused Products that infringe StayTouch intellectual property;
- b.) Set a target date of no more than fifteen months;
- c.) Schedule and conduct a hearing on permanent relief pursuant to 19 U.S.C. § 1337(c) for the purposes of receiving evidence and hearing argument concerning whether there has been a violation of Section 337, and following the hearing, to determine that there has been a violation of Section 337;
- d.) Issue a cease-and-desist order, pursuant to 19 U.S.C. § 1337(f), prohibiting Respondent and any related companies or divisions from conducting any of the following activities in the United States: importing, using, selling, marketing,

advertising, distributing, transferring, and/or soliciting U.S. agents or distributors for, Accused Products that infringe the StayTouch Intellectual Property;

- e.) Issue a limited exclusion order, pursuant to 19 U.S.C. § 1337(d) forbidding entry into the United States of Respondent's Accused Products that infringe the '369 Patent;
- f.) Impose a bond upon importation of Respondent's Accused Products that infringe one or more claims of the '369 Patent during the 60-day Presidential review period pursuant to 19 U.S.C. § 1337(j);
- g.) Issue such other and further relief as the Commission deems just and proper under the law, based upon the facts determined by the investigation and the authority of the Commission.

Dated: August 14, 2026

Respectfully submitted,

/s/ Benjamin E. Weed

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Technologies, Inc. d/b/a StayTouch*

VERIFICATION OF COMPLAINT

I, Gaurav Goel, am the Founder and Chief Executive Officer for GG Technologies Inc. d/b/a StayTouch (“StayTouch”) and am duly authorized by StayTouch to execute this verification of the accompanying Complaint under Section 337 of the Tariff Act of 1930, as amended (“Complaint”). I have read the Complaint and am aware of its contents. To the best of my knowledge, information, and belief, formed after an inquiry reasonable under the circumstances, I hereby certify that:

1. The allegations and other factual contentions contained in the Complaint are well grounded in fact and have evidentiary support, or are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery;
2. The claims and other legal contentions set forth in the Complaint are warranted by existing laws or by a good faith, non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law; and
3. The Complaint is not being filed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of the Investigation or related proceedings.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on August 10, 2026



Gaurav Goel